

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>Case No.: 3:06cr126-WHA</b>
	)	
<b>JOHN JENNINGS, II</b>	)	

**UNOPPOSED MOTION TO CONTINUE CHANGE OF PLEA HEARING**

**NOW COMES** the Defendant, by and through the undersigned counsel, and respectfully moves this Court to continue the Change of Plea Hearing in this matter. As grounds for granting this Motion, Defendant would show the following:

1. The trial has been continued from February 11, 2008 to March 3, 2008.
2. The United States, through Assistant United States Attorney Susan Redmond, does not oppose this request.
3. Both parties agree that Mr. Jennings has mental health limitations. The parties fully expect that this case will not proceed to trial.
4. Presently, based on the statute charged, Mr. Jennings faces a mandatory minimum sentence of not less than five (5) years.
5. In order to further assess a proper placement for Mr. Jennings' mental health limitations and his potential physical limitations and liability in prison, undersigned counsel would like one more continuance to obtain all necessary documentation to supply to the Bureau of Prisons.
6. This information may also be relevant to the formulation of a potential plea

agreement.

7. Due to the unusual and complex nature of the offense, undersigned counsel would also like time to consult a supervising attorney concerning a potential resolution.

**WHEREFORE**, defendant respectfully requests that this Motion be granted.

Dated this 4<sup>th</sup> day of February 2008.

Respectfully submitted,

s/ Aylia McKee

AYLIA MCKEE

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2008, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: Susan Redmond, Esq., Assistant United States Attorney.

Respectfully submitted,

s/ Aylia McKee  
AYLIA MCKEE  
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